

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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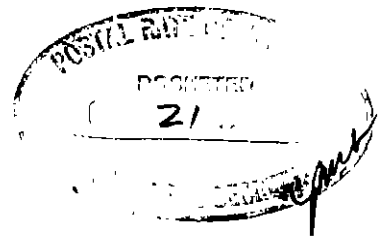
Special Services Fees and Classifications Docket No. MC96-3

ANSWER OF THE OFFICE OF THE CONSUMER ADVOCATE  
TO INTERROGATORY USPS/OCA-T100-6, parts a.-c., OF THE UNITED STATES  
POSTAL SERVICE, REDIRECTED TO WITNESS: SHERYDA C. COLLINS  
(October 21, 1996)

The Office of the Consumer Advocate hereby submits the answer  
of Sheryda C. Collins to interrogatory USPS/OCA-T100-6, parts a.-c.  
(October 7, 1996), redirected from witness Sherman. The  
interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

*Shelley S. Dreifuss*  
SHELLEY S. DREIFUSS  
Attorney  
Office of the Consumer Advocate



ANSWER OF OCA WITNESS SHERYDA C. COLLINS  
TO REDIRECTED INTERROGATORY USPS/OCA-T100-6

USPS/OCA-T100-6. Please refer to page 18 line [sic] 15-18 of your testimony.

- a. Do you contend that witness Needham has not presented accurate proposed certified mail costs and revenues at Tr. 4/1073 for Docket Nos. R90, R94, and MC96-3?
- b. If your answer to (a) is anything but an unqualified no, please identify all inaccurate information at Tr. 4/1073, and explain how one would derive accurate information about costs and revenues for certified mail.
- c. What is your understanding of the after-rates cost coverage for certified mail in Docket Nos. R90 and R94? Please explain in detail.

A. a.-b. I am unable to state with certainty whether the certified mail costs and revenues witness Needham presented (Tr. 4/1073) are accurate. Witness Needham's final answer to interrogatory OCA/USPS-T8-8 (revised answer filed September 9) and witness Lyons' oral explanation on September 9 (Tr. 2/153-54) came so late in the proceeding that I was not able to verify independently their representations. Also, the complete, written explanation requested in OCA's questions submitted in advance of oral cross-examination was not supplied.

c. It is my understanding that in Docket No. R90-1 Postal Service witness Larson testified that the after rates cost coverage for certified mail resulting from fee increases she proposed was 127 percent. USPS-T-22 at 40, Docket No. R90-1.

ANSWER OF OCA WITNESS SHERYDA C. COLLINS  
TO REDIRECTED INTERROGATORY USPS/OCA-T100-6

CONTINUATION OF ANSWER TO USPS/OCA-T100-6C:

It is my understanding that in Docket No. R94-1 Postal Service witness Foster testified that the after rates cost coverage for certified mail resulting from fee increases he proposed was 172.1 percent. USPS-T-11 at 65, Docket No. R94-1.

I would like to see a detailed, well-documented explanation in the record showing exactly the errors committed by Postal Service witnesses Larson and Foster in the two previous omnibus rate cases and the manner in which witness Needham has purportedly corrected them in the present proceeding. At a minimum, I believe that Larson's and Foster's workpapers should be presented with the mistakes they committed highlighted and explained. In addition, witness Needham should present her own workpapers plainly laying out her methodology for correcting/avoiding the alleged mistakes committed by earlier witnesses.

DECLARATION

I, Sheryda C. Collins, declare under penalty of perjury that the answer to redirected interrogatory USPS/OCA-T100-6 of the United States Postal Service is true and correct, to the best of my knowledge, information and belief.

Executed October 21, 1996

Sheryda C. Collins

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

*Shelley S. Dreifuss*  
SHELLEY S. DREIFUSS  
Attorney

Washington, DC 20268-0001  
October 21, 1996